

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION

JASON ADAM JENSEN,

Plaintiff,

v.

CITIBANK, N.A., et al.,

Defendants.

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Case No. 6:22-CV-03140-BCW

**DEFENDANTS CITIBANK, N.A., AND CITIGROUP, INC.’S MOTION FOR
EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S MOTION TO STRIKE AND
FOR DEFAULT JUDGMENT**

Defendants Citibank, N.A., and Citigroup, Inc. (collectively, the “Citi Defendants”), who have not yet been served with process, move for a twenty-one (21) day extension of time to respond to Plaintiff Jason Adam Jensen’s Motion to Strike Notice of Appearance By Citibank, N.A., Motion For Default Judgment Against Citibank, N.A. For Failure to Timely Respond (Doc. 69). In support of this Motion, the Citi Defendants state as follows:

1. The Citi Defendants have not been served with process. *See* Doc. 50 (Return of Service Unexecuted). Nonetheless, they elected to enter and contest Jensen’s deficient service.
2. Accordingly, on March 28, 2023, Citibank’s counsel entered their appearance. (Doc. 68). Shortly after the entry, Jensen filed a Motion to Strike and Motion for Default. (Doc. 69). To note, Citigroup, Inc. has filed its entry of appearance contemporaneous with this Motion.
3. The docket entry associated with Doc. 69 sets out a response deadline of April 11, 2023.
4. Although not yet served with process and thus not under an obligation to respond, the Citi Defendants request out of an abundance of caution that they be granted twenty-one (21)

additional days to respond to Doc. 69. Such extension would make the Citi Defendants' response due on May 2, 2023.

5. This is the Citi Defendants' first request for an extension.

6. The basis for this request is that Citi Defendants' lead counsel is on pre-planned international travel.

7. This Motion is not sought for the purpose of delay and will not prejudice any party.

WHEREFORE Defendants Citibank, N.A., and Citigroup, Inc., respectfully move this Court to enter an order granting Citibank, N.A., and Citigroup, Inc., an additional twenty-one (21) days to respond to Plaintiff Jason Adam Jensen's Motion to Strike Notice of Appearance By Citibank, N.A., Motion For Default Judgment Against Citibank, N.A. For Failure to Timely Respond (Doc. 69); and to grant such other and further relief as may be necessary.

Dated: April 11, 2023

Respectfully Submitted,

BRYAN CAVE LEIGHTON PAISNER LLP

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*ATTORNEYS FOR DEFENDANT CITIBANK, N.A. AND
CITIGROUP, INC.*

CERTIFICATE OF SERVICE

The undersigned certifies that, on April 11, 2023, the foregoing was served on all counsel of record via this Court's electronic filing system.

/s/ Benjamin A. Ford